

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA

*

v.

* **CASE NO. 2:18-cr-00178-DBH**

DERONG MIAO

*

DEFENDANT'S MOTION TO EXTEND TIME AND CONTINUE TRIAL

NOW COMES the Defendant, Derong Miao, by and through counsel, and moves the court to extend the deadline for filing motions and continue trial set for the October trial list. Limitations associated with COVID-19, including the recent Cumberland County Jail prohibition on attorney client visitation, have delayed the ongoing plea negotiation process. However, discussions continue to advance. The granting of this motion will require that the trial set for October be continued. Ms. Miao understands her speedy trial rights and waives same for the period of time requested. The government will not object to this motion.

WHEREFORE, Defendant moves the Court to extend the deadline to file motions to October 15, 2020 and continue the matter to the November trial list.

Dated: September 16, 2020

Respectfully submitted by,

/s/Jeffrey W. Langholtz
Jeffrey W. Langholtz, Esq.
Bar No. 3539
Attorney for the Defendant

Certificate of Service

I hereby certify that on September 16, 2020 I electronically filed Defendant's Motion to Extend Time and Continue Trial with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following: Assistant United States Attorney Darcie McElwee, and I hereby certify that on September 16, 2020, I have mailed by United States Postal Service, the document(s) to the following non-registered participants:

Derong Miao
Cumberland County Jail
50 County Way
Portland, ME 04102

/s/ Jeffrey W. Langholtz
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